

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

2 Charles K. Verhoeven (Bar No. 170151)

charlesverhoeven@quinnemanuel.com

3 David A. Perlson (Bar No. 209502)

davidperlson@quinnemanuel.com

4 Melissa Baily (Bar No. 237649)

melissabaily@quinnemanuel.com

5 John Neukom (Bar No. 275887)

johnneukom@quinnemanuel.com

6 Jordan Jaffe (Bar No. 254886)

jordanjaffe@quinnemanuel.com

7 50 California Street, 22nd Floor

San Francisco, California 94111-4788

8 Telephone: (415) 875-6600

9 Facsimile: (415) 875-6700

Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;

16 OTTOMOTTO LLC; OTTO TRUCKING

17 LLC,

18 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF JAMES JUDAH IN
SUPPORT OF DEFENDANTS'
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL THEIR OPPOSITION TO
WAYMO'S MOTION TO COMPEL
PRODUCTION OF DOCUMENTS AND
RESPONSES TO EXPEDITED
INTERROGATORIES AND EXHIBITS
THERE TO (DKTS. 907, 910)**

1 I, James Judah, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants’ Administrative Motion to File Under
7 Seal Their Opposition to Waymo’s Motion To Compel Production of Documents and Responses to
8 Expedited Interrogatories and Exhibits Thereto (Dkts. 907, 910) (the “Administrative Motion”). The
9 Administrative Motion seeks an order sealing highlighted portions of Uber Technologies, Inc.’s and
10 Ottomotto LLC’s Opposition to Waymo’s Motion to Compel (“Uber’s Opposition”) and Declaration
11 of Sylvia Rivera (“Rivera Decl.”), as well as Exhibits 1-3.

12 3. The green highlighted portions outlined in red of Uber’s Opposition, the green
13 highlighted portions of the Rivera Decl., the green highlighted portions of Exhibits 1-2, and Exhibit 3¹
14 contain or reference trade secret and confidential business information, which Waymo seeks to seal.

15 4. Uber’s Opposition (green highlighted portions outlined in red), Rivera Decl. (green
16 highlighted portions), Exhibits 1-2 (green highlighted portions), and Exhibit 3 (entire document)
17 contain, reference, and/or describe Waymo’s asserted trade secrets. The information Waymo seeks to
18 seal includes the confidential design and functionality of Waymo’s proprietary autonomous vehicle
19 system, which Waymo maintains as secret. I understand that these trade secrets are maintained as
20 secret by Waymo (Dkt. 25-47) and are valuable as trade secrets to Waymo’s business (Dkt. 25-31).
21 The public disclosure of this information would give Waymo’s competitors access to descriptions of
22 the functionality or features of Waymo’s autonomous vehicle system. If such information were made
23 public, I understand that Waymo’s competitive standing would be significantly harmed.

24
25
26 ¹ Versions of Uber’s Opposition and Exhibits 1-2 with revised redactions will be filed
27 concurrently herewith.
28

